



AMERICAN FEED INDUSTRY ASSOCIATION

August 15, 2005

Mr. Arthur Neal, Director  
Program Administration  
USDA/AMS/TMP/NOP  
Room 4008, South, Ag Stop 0268  
1400 Independence Ave., SW  
Washington, D.C. 20250

**Via Electronic Mail**

**Docket TM-05-02 Proposed Amendments to the National List of Allowed and Prohibited Substances (Livestock); Synthetic Methionine**

Dear Mr. Neal:

The American Feed Industry Association (AFIA) is the national trade association for feed and ingredient manufacturers and other firms which supply goods and services to the feed industry. AFIA's nearly 600 corporate members manufacture 75% of the nation's primary, commercial feed. Many AFIA members manufacture organic feed and will be affected by this rulemaking.

AFIA supports the proposed extension of DL-Methionine, DL-Methionine Hydroxy Analogue and DL-Methionine Hydroxy Analogue Calcium (collectively, Methionine) in the National List until October 1, 2008, as no organic substance has been discovered that would replace these substances in poultry diets. The conditions that warranted the addition of Methionine to the National List in 2003 and its initial petition of 1995 have not changed. There is no adequate organic substitute for Methionine for use in poultry diets.

The nutrient requirements for poultry as established by the National Research Council in 1994 have not changed and good nutrition and welfare practice requires meeting the nutrient requirements of animals. This cannot be done with currently available ingredients in the marketplace for poultry without the addition of Methionine. In 18 states that have adopted the Association of American Feed Control Officials' Model Feed Bill and Regulations, it is a prohibited act to enter into commerce a feed labeled for one species that is not suitable for that species.

For these reasons, AFIA believes the extension is prudent, warranted and necessary, and we urge USDA to complete the extension before the current extension expires on October 21, 2005 to prevent major disruption in the marketplace. I appreciate your consideration of these comments.

Sincerely,

Richard Sellers, PAS  
Vice President, Feed Control & Nutrition

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